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Hackensack, New Jersey 07601
201-342-9501
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Attorney for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

MICHAEL MORENO and MEDPRO,	:	
INC.	:	Civil Action No. 14-4002
	:	(Hon. Jerome B. Simandle)
Plaintiffs,	:	
-vs-	:	CERTIFICATION OF DEFENDANT
	:	IN SUPPORT OF MOTION FOR
RORY E. TRINGALI,	:	PRELIMINARY INJUNCTIVE RELIEF
	:	AGAINST PLAINTIFFS AND AGAINST
Defendant.	:	PROPOSED DEFENDANT JUSTIN
	:	MACKINTOSH WILLIAMS
	:	

STATE OF FLORIDA)
S.S.:
COUNTY OF DADE)

RORY E. TRINGALI certifies as follows:

1. I am the defendant in this action. The Court has entered a default against me. My motion to vacate that default and for leave to file an answer, counterclaim and cross-claims is pending before this Court.

2. While my motion has been pending, plaintiffs - in conjunction with Justin Mackintosh Williams - have been slandering me on the internet in exactly the way that plaintiffs claimed that I had done. I had not done so, which is why a) I did not seek to vacate any portion of the preliminary injunction and b) plaintiffs withdrew their motion to hold me in contempt of Court.

Now plaintiffs, perhaps feeling emboldened or immunized by the procedural status of this case, are doing to me that which they complained I had done to them.

3. I attach as **Exhibit A** a web posting dated December 16, 2014 and as **Exhibit B** a web posting dated December 20, 2014.

Exhibit A can be found at <http://www.complaintsboard.com/complaints/cosmeticlaserscom-rory-tringali-rory-tringali-cyber-stalking-amp-fabricated-slander-c738576.html>. **Exhibit B** can be found at <http://www.complaintsboard.com/complaints/cosmetic-laser-marketing-cosmetic-lasers-rory-tringali-fabricated-slander-c738044.html>.

4. Both postings were posted by a person who identifies himself as Everitas. The link to Everitas identifies the poster as an individual in Austin, Texas, the home of Justin Mackintosh Williams. See **Exhibit C**.

4. I believe that Michael Moreno is conspiring with Williams to post these comments about me. **Exhibit A** refers to attacks on MedPro. Moreno's complaint pleads that he is the "sole owner of Medpro." (Complaint ¶5), page 1 of which is attached as **Exhibit D**. This Court issued findings of fact and conclusions of law in resolving plaintiffs' motion for a preliminary injunction. Footnote 1 found that "Moreno is the sole owner of Medpro, Inc," **Exhibit E**. Moreno is the only person with motive sufficient to attack me; The hand may be the hand of Williams but the voice is that of Moreno.

5. In paragraph 6 of my certification filed October 6, 2014, before either Exhibit A or Exhibit B was posted, I testified:

I do believe that Mr. Moreno was and is associated with Mr. Williams and/or his wife, Brooke Eden Horan Williams, for between April 2013 and December 2013, Mr. Moreno deposited slightly over \$400,000 into a bank account in the name Quality Lasers d/b/a Cosmetic Laser Marketing, LLC. Quality Lasers was owned by Brooke Eden Horan Williams and by me. Brooke Williams works closely with her husband, Justin Williams. Justin Williams has no bank accounts or assets in his name; he keeps his assets in the name of his wife, in the name of his mother, Carol Williams, and in the name of Eagle Star Ranch, LLC, also known as ESR, LLC, a company owned by his mother even though Justin Williams conducts almost all of their activities.

6. I continue to maintain the beliefs to which I testified on October 6th.

7. I ask the Court to direct plaintiffs, just as it did me, a) to remove all references to me on the web sites set forth in paragraph 3, b) to enjoin plaintiffs from disparaging and/or defaming me and/or casting me in a negative light consistent with the "Non Disparagement and Defamation" provision of the settlement agreement which resolved the prior litigation and c) to enjoin plaintiffs from making defamatory postings against me, both directly and indirectly through their agent or co-conspirator, Justin Mackintosh Williams.

8. I certify that the foregoing statements made by me are true. I am aware that, if any of the foregoing statements made by me is wilfully false, I am subject to punishment.

Dated: December 23, 2014



Rory E Tringali

EXHIBIT A



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An Unbiased Review List of
The Top Performing Skin
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1,380

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8-9

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Plus500
Fraud-money stolen
2. (11 mins ago)
Black Boat Hairs
very bad and untrustable company
3. (15 mins ago)
Safestyle UK
Totally unprofessional
4. (21 mins ago)
Benze Vacation Club
False Commitment and Membership
5. (25 mins ago)
RoidstMall
Ripped Me Off, Only sent 1/2 of my order.

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Insurance When
You're a High-Risk
Driver



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Saved To Live Your
Ideal Life



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York Complaints & Reviews - Rory Tringali Fabricated
Slander

Cosmetic Laser Marketing Cosmetic Lasers Contacts & Informations

Cosmetic Laser Marketing Cosmetic Lasers

Posted: 2014-12-16 by Eventas

Rory Tringali Fabricated Slander

Complaint Rating:

Contact information:

Cosmeticlasers.com

Hicksville, New York

United States

RORY TRINGALI & CosmeticLasers.com, , Cosmetic Laser
Marketing, et al

Rory Tringali was a friend & at times business partner of mine. Rory has extorted, abused, slandered, & essentially stolen my life. Every day is a result of fabricated slander Rory either created or instigated on the internet. Rory uses complaint sites, as a weapon, to create slander under alias, to either extort or humiliate anyone he feels crosses him. Crossing Rory is as simple as making him accountable, which is what I did. After dealing with his erratic behavior & mood swings for 2 years I had enough. Rory owned 1/3 of a company with me & took nearly \$400,000 the first 6 mos. while I received less than \$15,000. We each had our own companies as well, so the business we had together was the one abused. I was responsible for everything. Such as covering daily bounced debits Rory called in to pay his bills, he used the account with reckless disregard. I was kept in chaos so I could not identify what was really happening. I do not believe Rory intentionally set out to do this, he is just irresponsible & abused me to get what he wanted as my life had no meaning to him other than the money I could provide. There is a Federal Restraining Order against Rory, he is currently under indictment in New Jersey for "Cyber Crimes" Class One Felony, as he launched a massive SPAM attack on a competitors website. Each time the competitor rebuilt their sites Rory launched another SPAM attack, causing hundreds of thousands of innocent people problems & the competitor hundreds of thousands in damages. Someone needs to stand up to Rory & make him responsible. He hides in a virtual world making it almost impossible to make him accountable for his actions. Just because everyone is afraid of him does not give him the right to wreck lives. Rory decided who I am, what I do, & has stalked me for over a year either fabricating or instigating problems & going as far as to cause me to lose the lease on my home. Customers he was responsible for or

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Experience



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Hurry Up!
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.com \$7.99
no hidden fees

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Amazon Launches
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physically took money from were instigated to attack me, as Rory refuses to be accountable for money he took or how his actions affect others. I will be posting the accounting, publishing proof Rory created dozens of alias' to fabricate slander & used it to instigate more. Rory invested money, a fraction of what I was responsible for, & he feels he is still owed even though he took 3-4x the money back out. He does not understand profit is the only money that can be spent & I was forced to cover a growing deficit alone. Rory spends his time spreading hate, hurting others, & wrecking lives, it is how he competes. Operating Cosmetic Laser Marketing, Cosmetic Laser World, Cosmetic Lasers, etc. from his parents home, where he has lived for years. Rory decided who I was, who I was going to be, what opportunity I would or would not have, & has defined how I live my life. Any person with a computer & hate in their heart can destroy someone's life with a few key strokes. If someone has a legitimate complaint then e mail me at this site & I will resolve it or provide irrefutable evidence I am not responsible. It ends for me now, I am breaking my silence & publishing everything on the internet as I am being judged without being heard. I challenge Rory to an accounting & to take accountability for the fabricated slander. I am even willing to forgive him & resolve our differences but I will not take the illegal attacks any longer. For every action there will be a reaction. Rory believes he was wronged so I challenge him to a public accounting & the world can judge who is right & who is wrong. If I am wrong I will do the right thing, bank records & accounting is the only truth to be considered, as numbers are definitive. My goal was to end the chaos, bring order to the business, & show Rory how reckless he was living, in hopes he would start working with me, rather than against me. It was essentially an intervention of sorts & Rory decided to go on the attack vs. listening to what his partners had to say. It is time for it to end.

Justin Williams

☐ Comments

☒ United States

☐ Other

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Was the above complaint useful to you? ☒ Yes ☐ No

Cosmetic Laser Equip Sale

Come Visit Our NYC Showroom
Today! Face Time & See All
Inventory Live

Post your Comment



Please check text spelling before submitting a
comment

Your attitude towards
Complaint

☒ Agree ☐ Neutral ☐ Disagree

Comment text

Please provide as much information as possible.

Attach photos (optional)


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EXHIBIT B



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Black Boat Hairs
very bad and untrustable company
- 3. (15 mins ago)
Safestyle UK
Totally unprofessional
- 4. (21 mins ago)
Benze Vacation Club
False Commitment and Membership
- 5. (25 mins ago)
RoidsMail
Ripped Me Off, Only sent 1/2 of my order.

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Cosmeticlasers.com Rory Tringali, Hicksville, New York
Complaints & Reviews - Rory Tringali Cyber Stalking & Fabricated Slander
Cosmeticlasers.com Rory Tringali Contacts & Informations

Cosmeticlasers.com Rory Tringali
Posted: 2014-12-20 by  Eventus
Rory Tringali Cyber Stalking & Fabricated Slander
Complaint Rating:

Contact information:
Cosmeticlasers.com
Hicksville, New York
United States
cosmeticlasers.com

MEDPRO LASERS ATTACKED BY ONLINE PREDATOR *****
COMPETITOR RORY TRINGALI ATTACKS MEDPRO WEBSITES

The following article's reference the arrest of Rory Tringali for orchestrating a series of cyber attacks against MedPro websites. Rory Tringali, owner of Cosmeticlasers.com, Cosmeticclaserworld, Hotdivas.com, Cosmeticclaserfraud.com & Cosmeticclasermarketing, paid for a "Virtual Hit" on competitor MedPro. MedPro's websites were hacked, causing sites to distribute 100, 000's of illegal SPAM, called a "Spoof Attack", to potentially millions of anonymous E mail addresses. Each receiving SPAM, by the 1, 000's, causing email & hard drives to crash. MedPro offices were flooded with calls & e mails from angry individuals, whose lives were affected by the crime. MedPro was listed as a major violator of illegal Spam & black listed from hosting sites as a result, forcing Medpro to spend tens of thousands, to re establish websites . As an online business, each attack was the equivalent of burning down a place of business & once rebuilt burning it down again. Each time sites were re established, Rory Tringali orchestrated another SPAM attack. Medpro was forced to purchase servers, establish private hosting, & spend tens of thousands in support & ongoing programming costs. Rory Tringali was arrested for masterminding the attacks, after a multi state law enforcement investigation. Rory Tringali is a convicted felon being prosecuted for Cyber Crimes, a Class One felony, in New Jersey by DA Kenneth Sharpe. This indictment was recently upheld on appeal & the State of NJ is proceeding to trial.

In addition to SPOOF attacks, Rory posts fabricated complaints, using alias', to cause competitors harm. Rory has done this for years, causing untold damage. I posted evidence proving Rory fabricated the

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Production of a White
iPhone This Month



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Repeat Downloads of
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d'ordinateur et j'utilise plus votre
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complaints. In an e mail, authored by Rory Tringali, he lists the alias' used & links to dozens of posts he admittedly fabricated (see previous post). Rory stalks Michael Moreno, Justin Williams, & families, doling out intimidation, threats, & fabricating slander. A Federal Judge issued a Restraining Order against Rory Tringali in June 2014. Rory continues to stalk, instigate, & slander regardless of the Restraining Order. Rory Tringali owns, cosmeticclaserfraud.com, a website used as a collection point, for the complaints he fabricates. Posing as an "Industry Activist", Rory is nothing more than a Cyber Bully using the internet to terrorize his victims. Rory causes competitors E Bay auctions to be cancelled, posts fabricated complaints, or instigates problems as his way to compete. Tringali operates "www.cosmeticclasers.com" from a spare room in his parents home in NY, posing as a "stocking dealer" & internet business magnate.

My name is Justin Williams, & I have been terrorized by Rory for years. I cannot get a speeding ticket without it being posted on the internet, Rory obsessively stalks me. Rory was a 1/3 partner & in 7 mos. spent \$400, 000, refusing to account for his spending & claiming he was, "Ripped Off". Rory took customers money & fabricated complaints instigating them to come after me, posing as a victim himself. I spent a year honoring commitments, while being attacked. I welcome Rory to respond as everything is coming out. I am posting bank records, to evidence Rory's spending, & proof Rory withdrew customer deposits, leaving me responsible. I tracked fabricated complaints to Rory & will make him accountable. Rory is a "Cyber Bully" using the internet to extort, threaten, & cause harm.

(2 original articles on arrest below)

Article #1

2 charged with hacking into Evesham company's Web site

By DANIELLE CAMILLI

Burlington County Times

A New Jersey grand jury indicted two Florida men yesterday on charges that they hacked into an Evesham-based company's Web sites, causing nearly \$900, 000 in losses.

Rory Edward Tringali, 36, and Matthew Justin Willner, 34, both of Miami Beach, were indicted on first-degree charges of computer criminal activity and conspiracy to commit computer criminal activity.

They were also indicted on second-degree charges of impersonation, conspiracy to commit impersonation, and attempted computer criminal activity.

In announcing the indictment, Attorney General Anne Milgram and Gregory A. Paw, director of the state Division of Criminal Justice, said the men disrupted the Web site of MedPro, a medical retail business.

Tringali was terminated as a consultant for the company in 2003,

authorities said. According to the indictment, Tringali paid Willner to hack into MedPro's Web sites from November 2006 to March 2007.

Authorities contend the online attacks impaired MedPro's ability to continue with business and prevented customers from communicating with the company, which is entirely Web-based.

The indictment also charges that Tringali and Willner sent out spam mail that indicated it was from MedPro.

Upon learning of the Web disruptions and junk mail, MedPro changed domain names twice, authorities said. However, the suspects hacked into the new sites, authorities said.

MedPro lost more than \$894, 000 as a result of Tringali and Willner's actions.

Tringali was arrested in Florida in February 2007 and extradited to New Jersey. Willner was arrested in Florida in March 2007 and agreed to turn himself over to authorities in New Jersey.

First-degree crimes carry a maximum sentence of 20 years in state prison and a fine of \$200, 000. Second-degree crimes carry a maximum sentence of 10 years in prison and a fine of \$150, 000.

Article #2

Fired MedPro Consultant Indicted For Spam, Disrupting Business

By K.C. Jones

InformationWeek

March 21, 2008 01:44 PM

Two Floridians have been indicted in New Jersey on charges of computer and impersonation crimes for allegedly disrupting an online business and causing almost \$900, 000 in losses.

Attorney General Anne Milgram and Criminal Justice Director Gregory A. Paw announced this week that a grand jury indicted Rory Edward Tringali, 36, and his Miami Beach neighbor, Matthew Justin Willner, 34, on first-degree charges of computer criminal activity and conspiracy to commit computer criminal activity, as well as second-degree charges of impersonation, conspiracy to commit impersonation, and attempted computer criminal activity.

The indictment (PDF) claims that Tringali was fired from his consulting job with MedPro, a Web-based company that sells lasers for about \$100, 000 each, in 2003. It claims he retaliated by paying Willner to disrupt the company's Web sites between November 2006 and March 2007.

The indictment states that the computer attacks impaired MedPro's ability to do business and blocked customer communication. It also claims the pair sent spam that looked like it had come from MedPro.

Detectives from the New Jersey Division of Criminal Justice -- Computer Analysis and Technology Unit and state prosecutors believe that MedPro changed domain names twice, but Tringali and Willner attacked the new sites. The online medical supplier claims more than \$894, 000 in losses as a result of the spam and Web site disruptions.

Tringali was arrested in Florida and extradited to New Jersey. Willner was arrested in Florida and agreed to turn himself over to authorities in New Jersey.

If the men are found guilty, they could face a maximum sentence of 20 years in state prison and a fine of \$200, 000 on the first-degree charges and a maximum sentence of 10 years in state prison and a fine of \$150, 000 for the second-degree charges.

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☒ United States

☐ Business & Finances

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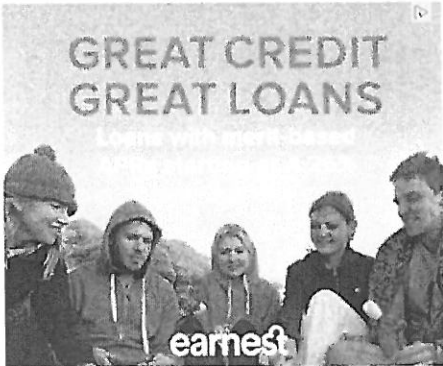
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Your attitude towards Complaint

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Please provide as much information as possible

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EXHIBIT C



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Totally unprofessional
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Benze Vacation Club
False Commitment and Membership
- (25 mins ago)
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Ripped Me Off, Only sent 1/2 of my order.

Posting summary

NYLASEROUTLET.com COSMETICLASERS.com - RORY TRINGALI * SEC INSIDER TRADING * FEDERAL RESTRAINING ORDER ISSUED [New Complaint]
 RORY E TRINGALI **** NYLASEROUTLET.COM & COSMETICLASERS.COM **** SEC INSIDER TRADING CHARGES ** FEDERAL RESTRAINING ORDER ISSUED AGAINST RORY TRINGALI I have been ruthlessly attacked by Rory Tringali & I am exposing his history of criminal behavior. A Convicted Felon, Rory Tringali, is under indictment for "Class One" Felony charges for "CYBER CRIMES". Rory is responsible...

DAVID ORGAZ - INTERNATIONAL WIRE FRAUD [New Complaint]
 FUTURE MEDICAL SPAIN ***** DAVID ORGAZ, FLORIDA ***** INTERNATIONAL WIRE & BANK FRAUD FOR OVER \$205,000 My name is Justin Williams. David Orgaz set me up & stole over \$205,000 from customers, leaving me responsible. David Orgaz set out to defraud me, I was targeted. David, preyed on my trust & ripped me off, costing hundreds of thousands in damages, taking 2 years to recover. I am posting th...

Cosmeticlasers.com Rory Tringali - Rory Tringali Cyber Stalking & Fabricated Slander [New Complaint]
 MEDPRO LASERS ATTACKED BY ONLINE PREDATOR **** COMPETITOR RORY TRINGALI ATTACKS MEDPRO WEBSITES The following article's reference the arrest of Rory Tringali for orchestrating a series of cyber attacks against MedPro websites. Rory Tringali, owner of Cosmeticlasers.com, Cosmeticlaserworld, Hotdivas.com, Cosmeticlaserfraud.com & Cosmeticlasermarketing, paid for a "Virtual Hit" on ...

Cosmetic Laser Marketing Cosmetic Lasers - Rory Tringali Fabricated Slander [New Complaint]
 RORY TRINGALI & CosmeticLasers.com, Cosmetic Laser Marketing, et al Rory Tringali was a friend & at times business partner of mine. Rory has extorted, abused, slandered, & essentially stolen my life. Every day is a result of fabricated slander Rory either created or instigated on the internet. Rory uses complaint sites, as a weapon, to create slander under alias, to either extort or humiliate...

Future Medical & David Orgaz - Deliberate Theft of \$215,000.00 [New Complaint]
 In September 2011 I wired \$215,000 to David Orgaz, with Future Medical in Spain, for a package of Cosmetic devices, 10 lasers & 20 Velasmoths in total. I worked with David before & trusted him. In December 2011 I received ONE CRATE, with a few broken parts & discovered I had been ripped off. David stole \$215,000 including \$7,500, for freight, to ship one crate of unidentifiable broken parts. I...

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EXHIBIT D

Warren S. Wolf, Esquire
GOLDBERG & WOLF, LLC
 1949 Berlin Road, Suite 201
 Cherry Hill, NJ 08003
 856-651-1600
 Attorneys for Plaintiffs

<p>MICHAEL MORENO AND MEDPRO, INC.</p> <p style="text-align: right;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>RORY E. TRINGALI</p> <p style="text-align: right;">Defendant.</p>	<p>SUPERIOR COURT OF NEW JERSEY BURLINGTON COUNTY CHANCERY DIVISION</p> <p>C- 32 -14</p> <p>VERIFIED COMPLAINT</p>
--	---

Plaintiffs, Michael Moreno and Medpro, Inc., allege against the Defendant, Rory E.

Tringali, as follows:

1. Plaintiff, Michael Moreno ("Moreno"), is an individual residing at 17 Tuxedo Court, Marlton, New Jersey 08053.
2. Medpro, Inc. ("Medpro") is a corporation formed in the State of New Jersey in 2001 with a business address of 532 Old Marlton Pike, Suite 256, Marlton, New Jersey 08053.
3. Moreno is and has always been the sole owner of Medpro.
4. Rory E. Tringali ("Defendant" or "Tringali") is an individual residing at 48 Walter Avenue, Hicksville, New York 11801.
5. All of the parties have been in the business of selling pre-owned cosmetic lasers for many years.
6. Non-party, Justin Williams, is an individual residing in Texas.
7. The Plaintiffs and Williams, either individually or through one of Williams' companies, previously worked together on many laser sale transactions whereby the profits of

EXHIBIT E

Case 1:14-cv-04002-JBS-KMW Document 9 Filed 07/24/14 Page 1 of 17 PageID: 277

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

MICHAEL MORENO, et al.,

Plaintiffs,

v.

RORY E. TRINGALI,

Defendant.

HONORABLE JEROME E. SIMANDLE

Civil Action
No. 14-4002 (JBS/KMW)

FINDINGS OF FACT
AND
CONCLUSIONS OF LAW

APPEARANCES:

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SIMANDLE, Chief Judge:

I. INTRODUCTION

Plaintiffs Michael Moreno and Medpro, Inc.,¹ filed this unopposed motion for an Order to Show Cause why a preliminary

¹ Moreno is the sole owner of Medpro, Inc.